

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

INGRID RAGANOVA,

Plaintiff(s),

UNITED AIRLINES, INC., UNITED
AIRLINES HOLDINGS, INC., GARRETT
FOSTER, STACY KATZ, & JOHN DOES
1-100,

Defendants.

Civil Action No.: 2:24-cv-09096

DECLARATION OF DOROTA KARPIERZ

I, Dorota Karpeirz, upon personal knowledge, declare and state as follows:

1. I am over the age of eighteen and am competent to give the testimony contained in this Declaration. The facts stated herein are true and correct and based on my personal knowledge, my review of relevant documents, information provided by individuals working with me or under my supervision, or my opinion based on my experience, knowledge, and information regarding matters related to United Airlines, Inc. (“United” or “Defendant”).

2. I am currently employed by United as Senior Case Manager, Employment Litigation and work principally in Chicago, Illinois.

3. United is a commercial airline that operates domestic and international flights.

United is a Delaware corporation with its principal place of business in Chicago, Illinois.

4. As a result of my position with United, I am familiar with United's Employee Profiles and payroll records, which contain information about an employee's address, salary, job title, etc.

5. Plaintiff Ingrid Raganova (“Plaintiff”) is employed by United as a Flight Attendant.

6. According to Plaintiff's Employee Profile, as of September 9, 2024, Plaintiff's address listed with United is Avenida Amalia Rodrigues, No. 10, 3A, Ramada 2620-520, Portugal. Plaintiff provided United with this address in August of 2018.

7. Plaintiff's address of record with United immediately prior to this change was in Florida.

8. Plaintiff's paystubs from United are issued to this same address in Portugal. Attached as **Exhibit A** is a true and correct copy of one of Plaintiff's paystubs.

9. Plaintiff's W2s issued by United are also issued to this same address in Portugal. Attached as **Exhibit B** are true and correct copies of Plaintiff's 2020-2023 W2 Forms issued by United.

10. Upon information and belief, Plaintiff has never provided United Airlines with an address located in New Jersey.

11. Plaintiff essentially "commutes" to United's base located in Newark, New Jersey from her home in Portugal.¹

I certify under penalty of perjury that the foregoing statements made by me are true and correct to the best of my knowledge and information.

By: 
DOROTA KARPIERZ

Dated: 09/10/2024

¹ It is not unusual for Flight Attendants to live in a different location than their base airport, as the nature of their position requires them to fly to any location served by United Airlines.